IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY

Master File No. 2:12-MD-02327 MDL 2327

LITIGATION

ETHICON WAVE 6 CASES LISTED IN EXHIBIT A TO PLAINTIFFS' NOTICE OF ADOPTION

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE OF STANLEY ZASLAU FOR WAVE 6

Plaintiffs filed a Notice of Adoption [Dkt. 4866] in the Wave 6 cases identified in Exhibit A to their Notice adopting their Motion to Exclude the Opinions and Testimony of Stanley Zaslau and Supporting Memorandum from Ethicon Wave 1, Wave 3, and Wave 4. Defendants hereby adopt and incorporate by reference their *Daubert* responses filed in relation to Stanley Zaslau in Ethicon Wave 1, Dkt. #2162 and Wave 3, Dkt. #2898 and Wave 4 Dkt. #3780. Defendants respectfully request that the Court deny Plaintiffs' motion, for the reasons expressed in Waves 1, 3 and 4 response briefings.

Dated: November 6, 2017

Respectfully submitted,

/s/ David B. Thomas

David B. Thomas (W.Va. Bar #3731) Thomas Combs & Spann PLLC 300 Summers Street Suite 1380 (25301) P.O. Box 3824 Charleston, WV 25338

/s/ Christy D. Jones

Christy D. Jones Butler Snow LLP 1020 Highland Colony Parkway Suite 1400 (39157) P.O. Box 6010 Ridgeland, MS 39158-6010

COUNSEL FOR DEFENDANTS ETHICON, INC. AND JOHNSON & JOHNSON

CERTIFICATE OF SERVICE

I hereby certify that on November 6, 2017, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ David B. Thomas

David B. Thomas (W. Va. Bar No. 3731) Thomas Combs & Spann, PLLC 300 Summers Street, Suite 1380 P.O. Box 3824 Charleston, WV 25338-3824 (304) 414-1800 dthomas@tcspllc.com